UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MAINE

UNITED STATES DEPARTMENT OF AGRICULTURE,

Plaintiff,

CASE NO. 2:25-cv-00224-SDN

v.

JAMIE L. CARTER,

and

VICTOR R. CARTER, SR.,

Defendants,

MOTION TO EXTEND TIME TO FILE MOTION FOR DEFAULT JUDGMENT

NOW COMES the Plaintiff United States Department of Agriculture (the "Plaintiff"), by and through its counsel, and moves, pursuant to Fed. R. Civ. P. 6(b) that this Court extend the period within which it may file its Motion for Default Judgment in this case from August 11, 2025 to September 10, 2025, as follows:

- 1. Plaintiff moved for entry of default against Defendants Jamie L. Carter and Victor R. Carter, Sr. ("Defendant Jamie L. Carter and Victor R. Cater, Sr.") on July 11, 2025. This Court entered an order granting Default against Defendants on the same day.
- 2. Since July 11, 2025, all the required documents for filing of the Motion for Default, including all affidavits, have been drafted, and Maine counsel is awaiting an original, signed affidavit from the Plaintiff to file said motion. To accommodate any delays in Maine counsel's receipt of that document, Maine counsel is requesting an extension of the filing deadline to September 10, 2025.

WHEREFORE, the Plaintiff prays that this Court: (a) extends to September 10, 2025, the period within which it may file a motion for default judgment with supporting documentation in this case; and (b) grant the Plaintiff such other and further relief as this Court deems just and proper.

Dated at Portland, Maine this August 13, 2025.

/s/ Kevin J. Crosman Kevin J. Crosman, Esquire Attorney for Plaintiff United States Department of Agriculture

JENSEN BAIRD GARDNER & HENRY Ten Free Street P.O. Box 4510 Portland, ME 04112 (207) 775-7271 kevincrosman@jensenbaird.com

CERTIFICATE OF SERVICE

I, Kevin J. Crosman, Esquire hereby certifies that on August 13, 2025, I served the above Motion upon the Defendants by mailing a copy of the same to them at the following addresses by first class mail, postage prepaid:

> Victor Carter 31 Glenview Drive Sabattus, ME 04280

> Jamie L. Carter 31 Glenview Drive Sabattus, ME 04280

Dated at Portland, Maine this August 13, 2025.

/s/ Kevin J. Crosman Kevin J. Crosman, Esquire Attorney for Plaintiff